Gregory A. Ross LAW OFFICE OF GREGORY A. ROSS, P.C. 4245 Kemp Blvd., Suite 308 Wichita Falls, Texas 76308 (940) 692-7800 (940) 692-7813 – FAX State Bar No. 17302500 Attorney for POSTEL FAMILY CREDIT UNION

Response to Notice of Final Cure Payment

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

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IN RE:				
JIMMY DEAN ANDREWS,	Case No. 16-70168-HDH-13			
Debtor.	(Chapter 13)			
	CICE OF FINAL CURE PAYMENT  editor, hereby responds to Trustee's Notice of Final			
Final Cur	re Amount			
Agrees that the Trustee has paid the amount listed on the Notice towards the Creditor's Claim.  Disagrees that the Trustee has paid the amounts listed on the Cure Notice towards the Creditor's Claim. Creditor states the total amount received as of the date of the Cure Notice is \$				
Monthly Ongoing	Mortgage Payment			
Mortgage is Paid:				
☐ Through the Chapter 13 Conduit	■ Direct by the Debtor			

Page 1

The Debtor is delinquent with respect to his post-petition payments, fees and costs as of the date of the Notice and states that the total amount to cure the post-petition arrears is: \$1,019.99.

Attached is an itemized Statement of the post-petition arrearage due through the date listed on the Statement. The outstanding amounts identified on the Statement do not reflect amounts that become due after the date listed thereon, including any fees that may have been incurred in the preparation, filing or prosecution of this Notice.

The outstanding amounts identified on the attached Statements may not, due to timing, reflect all payments sent to Creditor as of the date stated therein. In addition, the amounts due may include payments reflected on the Notice, but which have not yet been received and/or processed by Creditor.

Respectfully submitted,

LAW OFFICE OF GREGORY A. ROSS, P.C. 4245 Kemp Blvd., Suite 308 Wichita Falls, Texas 76308 (940) 692-7800 (940) 692-7813 – FAX

By: /s/ Gregory A. Ross
Gregory A. Ross
State Bar No. 17302500

## **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was on June 19, 2019, duly served on all parties of interest.

/s/ Gregory A. Ross Gregory A. Ross

## Case 16-70168-hdh13 Doc 37-Filed 06/19/19 Entered 06/19/19 07:33:42 Page 3 of 5

MS5252R QUSER POSTEL FAMILY CREDIT UNION MEMBER ACCOUNT HISTORY

AD

PAGE 1 11:11:59

6/18/19

ACCT.#

XXXXX3837

ANDREWS, JIMMY D. PO BOX 43 HOLLIDAY, TX 76366

THE PERSON HAVE A PROPERTY OF THE

TEL. NUMBER: (940) 235-5374

DATES 5/31/16 THRU 6/18/19

DATE	TRANSACTION REF TOTAL DESCRIPTION NUMBR TRAN AMT	LOAN INT AMT		ACCOUNT BALANCT
LOAN SU	FFIX 020 DEED OF TRUST	the site but the me we have the factories		
			BEG BAL.	81477.07
6/01/16	FTF XX3453-005 60116 966.14-	259.50	706.64	80770.43
	6/01/16 FT Transfer Pmt			- Control of the Cont
6/01/16	ESCROW DEPOSIT 60116 323.59		323.59	81094.02
- 1 1	6/01/16 FT Transfer Pmt	all and a second	NORTH TODAY OF THE	and security
6/30/16	FTF XX3453-005 63016 966.14-	249.67	716.47	80377.55
6/30/16	6/30/16 FT Transfer Pmt ESCROW DEPOSIT 63016 323.59		202 50	00701 14
0/30/10	6/30/16 FT Transfer Pmt		323.59	80701.14
8/01/16		274.16	691.98	80009.16
,,	8/01/16 FT Transfer Pmt	a la la c	031.30	00005.10
8/01/16	ESCROW DEPOSIT 80116 323.59		323.59	80332.75
4 1 1	8/01/16 FT Transfer Pmt			
9/01/16	FTF XX3453-005 90116 966.14-	264.38	701.76	79630.99
	9/01/16 FT Transfer Pmt			
9/01/16	ESCROW DEPOSIT 90116 323.59		323.59	79954.58
7 2 / 2 2 / 2 6	9/01/16 FT Transfer Pmt	2 12 2 2 2 2	10 O O O	
10/03/16	FTF XX3453-005100316 966.14- 10/03/16 FT Transfer Pmt	271.63	694.51	79260.07
10/02/16	Escrow Transfer 100316 323.59		222 50	70502 66
10/03/10	10/03/16 FT Transfer Pmt		323.59	79583.66
10/31/16	FTF XX3453-005103116 966.14-	236.57	729.57	78854.09
Ta / Ta T / Ta A	10/31/16 FT Transfer Pmt	200.07	,25.5,	70034.03
12/02/16	FTF XX3453-005120216 966.14-	267.89	698.25	78155.84
	12/02/16 FT Transfer Pmt			
12/02/16	Escrow Transfer 120216 323,59		323.59	78479.43
	12/02/16 FT Transfer Pmt	X X		
1/03/17	FTF XX3453-005 10317 966.14-	266.61	699.53	77779.90
1/02/17	1/03/17 FT Transfer Pmt Escrow Transfer 10317 323.59		444 -A	B04.00 H0
1/03/1/	1/03/17 FT Transfer Pmt		323.59	78103.49
1/31/17	FTF XX3453-005 13117 966.14-	232.17	733.97	77369.52
-/ -/ -/	1/31/17 FT Transfer Pmt	232.11	755.57	11309.32
1/31/17	Escrow Transfer 13117 323.59		323.59	77693.11
	1/31/17 FT Transfer Pmt			,,,,,,,,,,,
3/01/17	FTF XX3453-005 30117 966.14-	239.20	726,94	76966.17
ii	3/01/17 FT Transfer Pmt			
3/01/17	Escrow Transfer 30117 323.59		323.59	77289.76
_ /_ /_ /	3/01/17 FT Transfer Pmt	PROCESS 11, 1999		
3/31/17	FTF XX3453-005 33117 966.14-	246.16	719.98	76569.78
2/21/17	3/31/17 FT Transfer Pmt	promotion and the second	202 50	
3/31/1/	Escrow Transfer 33117 323.59 3/31/17 FT Transfer Pmt		323.59	76893.37
5/01/17		253.06	868.84	76024 62
2107171	5/01/17 FT Transfer Pmt	233.00	000.04	76024.53
5/01/17	Escrow Transfer 50117 479.35		479.35	76503.88
-,				1000.00

MS5252R POSTEL FAMILY CREDIT UNION QUSER MEMBER ACCOUNT HISTORY	AD 6/18/19	PAGE 2 11:11.59
5/01/17 FT Transfer Pmt 6/01/17 FTF XX3453-005 60117 1121.90- 251.78 6/01/17 FT Transfer Pmt	870.12	75633.76
6/01/17 Escrow Transfer 60117 479.35 6/01/17 FT Transfer Pmt	479.35	76113.11
7/05/17 FT Transfer Pmt 7/05/17 FTF XX3453-005 70517 1121.90- 274.74 7/05/17 FT Transfer Pmt	847.16	75265.95
7/05/17 FT Transfer Pmt 7/05/17 Escrow Transfer 70517 479.35 7/05/17 FT Transfer Pmt	479.35	75745.30
8/07/17 FTF XX3453-005 80717 1121.90- 265.37 8/07/17 FT Transfer Pmt	856.53	74888.77
8/07/17 Escrow Transfer 80717 479.35 8/07/17 FT Transfer Pmt	479.35	75368.12
9/01/17 FTF XX3453-005 90117 1121.90- 200.03 9/01/17 FT Transfer Pmt	921.87	74446.25
9/01/17 Escrow Transfer 90117 479.35 9/01/17 FT Transfer Pmt	479.35	74925.60
10/03/17 FTF XX3453-005100317 1121.90- 254.54 10/03/17 FT Transfer Pmt	867.36	74058.24
10/03/17 Escrow Transfer 100317 479.35 10/03/17 FT Transfer Pmt	479.35	74537.59
11/03/17 FTF XX3453-005110317 1121.90- 245.31 11/03/17 FT Transfer Pmt	876.59	73661.00
11/03/17 Escrow Transfer 110317 479.35 11/03/17 FT Transfer Pmt	479.35	74140.35
12/04/17 FTF XX3453-005120417 1121.90- 244.00 12/04/17 FT Transfer Pmt	877.90	73262.45
12/04/17 Escrow Transfer 120417 479.35 12/04/17 FT Transfer Pmt	479.35	73741.80
1/17/18 FTF XX3453-005 11718 1111.90- 344.46 1/17/18 FT Transfer Pmt	767.44	72974.36
1/17/18 LATE PAYMENT FEE 11718 10.00- 10.00 1/17/18 Escrow Transfer 11718 479.35	479.35	72974.36 73453.71
1/17/18 FT Transfer Pmt 2/16/18 FTF XX3453-005 21618 1111.90- 233.94		72575.75
2/16/18 FT Transfer Pmt 2/16/18 LATE PAYMENT FEE 21618 10.00- 10.00	011.90	72575.75
2/16/18 Escrow Transfer 21618 479.35 2/16/18 FT Transfer Pmt	479.35	73055.10
3/16/18 FTF XX3453-005 31618 1121.90- 217.16 3/16/18 FT Transfer Pmt	904.74	72150.36
3/16/18 Escrow Transfer 31618 479.35 3/16/18 FT Transfer Pmt	479.35	72629.71
5/14/18 FTF XX3453-005 51418 1111.90- 454.93 5/14/18 FT Transfer Pmt	656.97	71972.74
5/14/18 LATE PAYMENT FEE 51418 10.00- 10.00 5/14/18 Escrow Transfer 51418 464.70	464.70	71972.74 72437.44
5/14/18 FT Transfer Pmt 7/15/18 FTF XX3453-005 71518 1089.77- 476.80		
7/15/18 FT Transfer Pmt	612.97	71824.47
7/15/18 Escrow Transfer 71518 464.70	464.70	71824.47 72289.17
7/15/18 FT Transfer Pmt 7/30/18 FTF XX3453-005 73018 1075.12- 115.12 7/30/18 FT Transfer Pmt	960.00	71329.17
7/30/18 LATE PAYMENT FEE 73018 32.13- 32.13		71329.17

	MS5252R	POSTEL FAMILY CREDIT UNION	AD	9 83	PAGE 3
	QUSER	MEMBER ACCOUNT HISTORY		6/18/19	11:11:59
	7/20/20	The same of the same of the same			22.4 - 1 7
	7/30/18	Escrow Transfer 73018 464.70		464.70	71793.87
	0/15/10	7/30/18 FT Transfer Pmt FTF: XX3453-005 81518 1107.25- 121.95			
	8/12/19	FTF XX3453-005 81518 1107.25- 121.95		985.30	70808.57
	0/15/10	8/15/18 FT Transfer Pmt Escrow Transfer 81518 464.70		464 80	E10E2 0E
81); 3	0/13/10	8/15/18 FT Transfer Pmt		464.70	71273.27
	9/16/19	FTF XX3453-005 91618 1107.25- 242.13		0.00	70400 35
	2/10/10	9/16/18 FT Transfer Pmt		865.12	70408.15
	9/16/19	Escrow Transfer 91618 464.70		164 70	70070 05
	3/10/10	9/16/18 FT Transfer Pmt		464.70	70872.85
	10/03/18	CHAPTER 13 72984 18.98-		18.98	70052 07
	10/16/18	FTF XX3453-005101618 1107.25- 225.70	3.60	881.55	70853.87
110	10/10/10	10/16/18 FT Transfer Pmt		001.33	69972.32
	10/16/18	Escrow Transfer 101618 464.70		464.70	70427 02
		10/16/18 FT Transfer Pmt		404.70	70437.02
	11/16/18	FTF XX3453-005111618 1107.25- 231.81		875.44	69561.58
	11/10/10	11/16/18 FT Transfer Pmt		0/3.44	96.10669
	11/16/18	Escrow Transfer 111618 464.70		464.70	70026.28
	11/10/10	11/16/18 FT Transfer Pmt		#04.70	10020.20
	12/14/18	FTF XX3453-005121418 1107.25- 208.16		899.09	69127.19
	//	12/14/18 FT Transfer Pmt	1 1	099.09	03121.13
	12/14/18	Escrow Transfer 121418 464.70		464.70	69591.89
22		12/14/18 FT Transfer Pmt		404.70	09391.69
	1/15/19	FTF XX3453-005 11519 1107.25- 236.42		870.83	68721.06
	1/10/10	1/15/19 FT Transfer Pmt		070.03	00/21.00
	1/15/19	Escrow Transfer 11519 464.70		464.70	69185.76
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	2/14/19	FTF XX3453-005 21419 1107.25- 220.35		886.90	68298.86
	-,,	2/14/19 FT Transfer Pmt		000,00	00250.00
	2/14/19	Escrow Transfer 21419 464.70		464.70	68763.56
		2/14/19 FT Transfer Pmt		-9-114	00703.50
	4/10/19	FTF XX3453-005353140 1075.12- 401.51		673.61	68089.95
	13.10	4/10/19 FT Transfer Pmt			00000.00
	4/10/19	LATE PAYMENT FEE353140 32.13- 32.13 Escrow Transfer 353140 464.70			68089.95
	4/10/19	Escrow Transfer 353140 464.70		464.70	68554.65
		4/10/19 FT Transfer Pmt		2004 AVE V 176	
	5/01/19	FTF XX3453-005159248 1075.12- 152.84		922.28	67632.37
	in the same to the same of	5/01/19 FT Transfer Pmt		1. A. C. M. 1. 2. C.	35 1947 ST 97 1 40
	5/01/19	LATE PAYMENT FEE159248 32.13- 32.13			67632.37
		Escrow Transfer 159248 464.70		464.70	68097.07
10		5/01/19 FT Transfer Pmt			THE PROPERTY OF THE PROPERTY OF
	5/10/19	Loan Add 46774 262.50		262.50	68359.57
		LEGAL FEE'S 6503837-20 J.ANDREWS			
	5/17/19	FTF XX3453-005956306 1107.25- 115.87		991.38	67368.19
	ALL SE CONTRACTOR OF THE SECOND SECON	5/17/19 FT Transfer Pmt			- construction of the second
	5/17/19	Escrow Transfer 956306 445.21		445.21	67813.40
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